

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA ) Criminal No. 3:22-CR-86 (TJM)  
v. )  
JEREMIE HOYT, )  
Defendant. )  
 ) Information  
 )  
 ) Violations: 18 U.S.C. § 2251(a)  
 ) [Sexual Exploitation of a  
 ) Child]  
 ) 18 U.S.C. § 2252A(a)(2)(A),  
 ) [Distribution of Child  
 ) Pornography]  
 ) 18 U.S.C. § 2252A(a)(5)(B),  
 ) Possession of Child  
 ) Pornography]  
 )  
 )  
 )  
 ) 5 Counts & Forfeiture Allegation  
 )  
 ) County of Delaware  
 ) Offenses:

## **THE UNITED STATES ATTORNEY CHARGES:**

**COUNT 1**  
**[Sexual Exploitation of a Child]**

On or about August 19, 2019, in Delaware County in the Northern District of New York, the defendant, **JEREMIE HOYT**, did use V-1, a minor male child born in 2006 whose identity is known to the defendant, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions

were actually transported and transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

**COUNT 2**  
**[Sexual Exploitation of a Child]**

On or about November 11, 2020, in Delaware County in the Northern District of New York, the defendant, **JEREMIE HOYT**, did use V-1, a minor male child born in 2006 whose identity is known to the defendant, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, in violation of Title 18, United States Code, Section 2251(a).

**COUNT 3**  
**[Distribution of Child Pornography]**

On or about January 20, 2021, in Delaware County in the Northern District of New York, the defendant, **JEREMIE HOYT**, did knowingly distribute child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using a social media messaging application, distributed to another user via the internet one or more graphic video files

depicting V-1, a minor male child born in 2006 whose identity is known to the defendant, engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

**COUNT 4**  
**[Distribution of Child Pornography]**

On or about March 15, 2021, in Delaware County in the Northern District of New York, the defendant, **JEREMIE HOYT**, did knowingly distribute child pornography using a means and facility of interstate and foreign commerce, shipped and transported in and affecting such commerce by any means, including by computer, in that the defendant, using a messaging application, distributed to another user via the internet one or more graphic image and video files depicting V-1, a minor male child born in 2006 whose identity is known to the defendant, engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

**COUNT 5**  
**[Possession of Child Pornography]**

On or about April 28, 2021, in Delaware County, in the Northern District of New York, the defendant, **JEREMIE HOYT**, did knowingly possess material that contained one or more images and videos of child pornography that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is an iPad Pro 4<sup>th</sup> Generation, IMEI 352782113393745, manufactured in China, containing graphic image and video files of a minor engaged in sexually explicit conduct in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

## **FORFEITURE ALLEGATION**

The allegations contained in Counts One through Five of this information are hereby realleged and incorporated by reference for the purposes of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253(a).

Pursuant to Title 18, United States Code, Section 2253(a), upon conviction of the charges alleged in Counts One through Five, the defendant, **JEREMIE HOYT**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251 (incorporating the definition of child pornography in 18 U.S.C. §2256(8)), and any book, magazine, periodical, film, videotape, and other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. Any property, real and personal, constituting and traceable to gross profits and other proceeds obtained from the offense, and
- c. Any property, real and personal, used and intended to be used to commit and to promote the commission of the offense.

The property subject to forfeiture includes, but is not limited to, the following:

- (1) One iPhone 11 Pro Max cellular telephone, IMEI 352849115554515, manufactured in China; and
- (2) One iPad Pro 4<sup>th</sup> Generation, IMEI 352782113393745, manufactured in China.

Dated: April 20, 2022

CARLA B. FREEDMAN  
United States Attorney

By: /s/ Geoffrey J.L. Brown

Geoffrey J. L. Brown  
Assistant United States Attorney  
Bar Roll No. 513495